

**Hearing Date: October 13, 2009 at 9:45 a.m.**

**Seward & Kissel LLP**

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*Attorneys for Wilmington Trust Company, as  
Successor Indenture Trustee for the 2015  
Notes*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

LYONDELL CHEMICAL COMPANY, et al.,  
  
Debtors.

Case No. 09-10023 (REG)

Chapter 11

(Jointly Administered)

LYONDELL CHEMICAL COMPANY, et al.,  
  
Plaintiffs,  
v.

WILMINGTON TRUST COMPANY, AS  
TRUSTEE,  
  
Defendant.

Adv. Proc. No. 09-01459 (REG)

**NOTICE OF FILING OF PROPOSED STIPULATION**

PLEASE TAKE NOTICE that, in connection with the hearing scheduled to be held on October 13, 2009 at 9:45 a.m. (EST) before the Honorable Robert E. Gerber, United States Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, to consider Debtors' Motion For A Preliminary Injunction Pursuant to Section 105(a) of the

Bankruptcy Code, Rule 65 of the Federal Rules of Civil Procedure, and Rules 7001(7) and 7065 of the Federal Rules of Bankruptcy Procedure Preventing the Exercise of Rights and Remedies Under the 2015 Notes from Disrupting the Reorganization of LyondellBasell, dated August 28, 2009 [Adv. Proc. Docket Nos. 2-5], against Wilmington Trust Company, as successor indenture trustee (the “2015 Indenture Trustee”) of the holders of \$615,000,000 8<sup>3</sup>/<sub>8</sub> % Senior Notes Due 2015 and €500,000,000 8<sup>3</sup>/<sub>8</sub> % Senior Notes Due 2015 (collectively, the “2015 Notes”), the 2015 Indenture Trustee is hereby submitting a proposed stipulation in the form attached hereto as Exhibit 1.

Dated: September 11, 2009

Respectfully submitted,

SEWARD & KISSEL LLP

By: /s/ John R. Ashmead

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